

**REMARKS**

By this Amendment, Applicants propose to amend claims 1, 8, 14, and 20. Claims 1, 3, 5-8, 10, 12-14, 16, 18-20, 22, 24, 25, 28, and 29 are pending in this application.

In the Final Office Action,<sup>1</sup> the Examiner rejected claims 1, 8, 14, and 20 under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement; rejected claims 1, 6-8, 10, 12-14, 16, 18-20, 22, 24, 25, 28, and 29 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Publication No. 2003/0004874 to Ludwig et al. ("*Ludwig*") in view of U.S. Publication No. 2004/0111302 to Falk et al. ("*Falk*"); and rejected claims 3 and 5 under 35 U.S.C. § 103(a) as being unpatentable over *Ludwig* in view of *Falk* and U.S. Patent No. 6,578,015 to Haseltine et al. ("*Haseltine*").

**I. Rejection of Claims 1, 8, 14, and 20 Under 35 U.S.C. § 112, First Paragraph**

Applicants respectfully traverse the rejection of claims 1, 8, 14, and 20 under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. The Examiner alleges that "[d]isplaying the workflow on a display" is not described in the specification." Final Office Action at 2. The Examiner allegation is incorrect. However, to advance prosecution, Applicants propose to delete the above-quoted recitations from claims 1, 8, 14, and 20. Accordingly, Applicants

---

<sup>1</sup> The Final Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Final Office Action.

respectfully request the Examiner to reconsider and withdraw the rejection of claims 1, 8, 14, and 20 under 35 U.S.C. § 112, first paragraph.

**II. Rejection of Claims 1, 6-8, 10, 12-14, 16, 18-20, 22, 24, 25, 28, and 29 Under 35 U.S.C. § 103(a)**

Applicants respectfully traverse the rejection of claims 1, 6-8, 10, 12-14, 16, 18-20, 22, 24, 25, 28, and 29 under 35 U.S.C. § 103(a) as being unpatentable over *Ludwig* in view of *Falk*. A *prima facie* case of obviousness has not been established.

“The key to supporting any rejection under 35 U.S.C. 103 is the clear articulation of the reason(s) why the claimed invention would have been obvious.” M.P.E.P. § 2142(III), 8th Ed., Rev. 6 (Sept. 2007). “[T]he framework for objective analysis for determining obviousness under 35 U.S.C. 103 is stated in *Graham v. John Deere Co.*, 383 U.S. 1, 148 USPQ 459 (1966). . . . The factual inquiries . . . are as follows:

- (A) [Determining the scope and content of the prior art;]
- (B) Ascertaining the differences between the claimed invention and the prior art;  
and
- (C) Resolving the level of ordinary skill in the pertinent art.”

M.P.E.P. § 2141(II). “Office personnel must explain why the difference(s) between the prior art and the claimed invention would have been obvious to one of ordinary skill in the art.” M.P.E.P. § 2141(III).

Independent claim 1, as amended, calls for a combination including, for example, “a link to the current state stored in a state value table comprising a plurality of states of the processing of the invoice.”

*Ludwig* discloses a “link . . . to the invoice history page.” *Ludwig*, para. 0092.

However, the “link . . . to the invoice history page” in *Ludwig* cannot constitute “a link to the current state stored in a state value table,” as recited in claim 1.

The Examiner attempts to cure this deficiency of *Ludwig* with *Falk*, which discloses a “workflow table” (*Falk*, para. 0589) and “the Examiner interprets the workflow table [in *Falk*] as [the claimed] state value table.” Final Office Action at 6. However, the workflow table in *Falk* comprises, at best, “workflow states.” See, e.g., *Falk*, paras. 0516, 0589. The workflow table in *Falk* does not comprise “states of the processing of the invoice,” as recited in claim 1 (emphasis added). As evident from Applicants’ claims, the claimed “invoice” is distinct from the claimed “workflow.”

Therefore, the workflow table in *Falk* comprising workflow states cannot correspond to the claimed “state value table comprising a plurality of states of the processing of the invoice.” For at least this reason, *Falk* fails to cure the deficiencies of *Ludwig*.

Accordingly, *Ludwig* and *Falk*, individually or in combination, fail to disclose or suggest “a state value table comprising a plurality of states of the processing of the invoice,” as recited in claim 1 (emphasis added).

Moreover, even assuming that the workflow table in *Falk* could correspond to the claimed “state value table,” which Applicants have shown above that it does not, *Ludwig* and *Falk* fail to disclose “a link to the current state stored in a state value table,” as recited in claim 1. As noted above, *Ludwig* discloses “a link . . . to the invoice history page.” *Ludwig*, para. 0092. That is, the link in *Ludwig* is a link to the entire history page, not necessarily a link to any specific value within the history page. Accordingly,

the combination of *Ludwig* and *Falk* could at best disclose a link to the entire workflow table, but not a link to a specific workflow state within the workflow table. Therefore, *Ludwig* and *Falk*, individually or in combination, fail to disclose or suggest “a link to the current state stored in a state value table comprising a plurality of states,” as recited in claim 1 (emphasis added).

For at least the foregoing reasons, the scope and content of the prior art have not been properly determined, and the differences between the prior art and claim 1 have not been properly ascertained. Accordingly, no reason has been clearly articulated as to why the prior art would have rendered claim 1 obvious to one of ordinary skill in the art. Therefore, a *prima facie* case of obviousness has not been established with respect to claim 1.

Furthermore, independent claims 8, 14, and 20, although different in scope from claim 1, are allowable for at least reasons similar to those given for claim 1. Dependent claims 6, 7, 10, 12, 13, 16, 18, 19, 22, 24, 25, 28, and 29 are allowable at least due to their dependence from allowable base claims 1, 8, 14, and 20. Accordingly, Applicants respectfully request the Examiner to reconsider and withdraw the rejection of claims 1, 6-8, 10, 12-14, 16, 18-20, 22, 24, 25, 28, and 29 under 35 U.S.C. § 103(a).

### **III. Rejection of Claims 3 and 5 Under 35 U.S.C. § 103(a)**

Applicants respectfully traverse the rejection of claims 3 and 5 under 35 U.S.C. § 103(a) as being unpatentable over *Ludwig* in view of *Falk* and *Haseltine*. A *prima facie* case of obviousness has not been established.

As discussed above, *Ludwig* and *Falk* fail to disclose “a link to the current state stored in a state value table comprising a plurality of states of the processing of the invoice,” as recited in independent claim 1, and required by dependent claims 3 and 5. Regardless of whether the Examiner’s characterization of *Haseltine* in the Final Office Action is correct, which it is not, *Haseltine* fails to cure the deficiencies of *Ludwig* and *Falk*. That is, *Haseltine* also fails to disclose or suggest “a link to the current state stored in a state value table comprising a plurality of states of the processing of the invoice,” as recited in claim 1, and required by claims 3 and 5. For at least this reason, a *prima facie* case of obviousness has not been established with respect to claims 3 and 5. Accordingly, Applicants respectfully request the Examiner to reconsider and withdraw the rejection of claims 3 and 5 under 35 U.S.C. § 103(a).

### **CONCLUSION**

Applicants respectfully request the Examiner to enter this Amendment under 37 C.F.R. § 1.116, placing claims 1, 3, 5-8, 10, 12-14, 16, 18-20, 22, 24, 25, 28, and 29 in condition for allowance. Applicants submit that the proposed amendments of claims 1, 8, 14, and 20 do not raise new issues or necessitate the undertaking of any additional search of the art by the Examiner. Therefore, this Amendment should allow for immediate action by the Examiner.

Applicants further submit that the entry of the amendments would place the application in better form for appeal, should the Examiner dispute the patentability of the pending claims.


In view of the foregoing, Applicants respectfully request reconsideration of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER, L.L.P.

Dated: March 6, 2008

By:   
Peter C. Yi  
Reg. No. 61,790  
202.408.4485